

**Hecker Fink LLP**350 FIFTH AVENUE | 63<sup>RD</sup> FLOOR  
NEW YORK, NEW YORK 101181050 K STREET NW | SUITE 1040  
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.HECKERFINK.COM

DIRECT DIAL 929.294.2536

DIRECT EMAIL gtenzer@heckerfink.com

February 28, 2025

**VIA ECF**

The Honorable Dale E. Ho  
United States District Court  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Doe v. Columbia University*, No. 23-cv-10393-DEH (S.D.N.Y.); *Doe v. Hunter*, No. 23-cv-10394-DEH (S.D.N.Y.); *Doe v. Kachalia*, No. 23-cv-10395-DEH (S.D.N.Y.)

Dear Judge Ho:

We write on behalf of Defendant Trustees of Columbia University in the City of New York (“Columbia”) regarding Plaintiff’s Reply Memorandum in Further Support of Motion to Alter or Amend the Judgment Pursuant to Rule 59(e) (“Plaintiff’s Reply”), which was publicly filed on the docket in the three above-captioned actions today.<sup>1</sup> Columbia respectfully requests that Plaintiff’s Reply be placed under seal in all three actions.

Plaintiff’s Reply contains sensitive information regarding the parties’ confidential settlement agreement, which the Court has previously ordered remain under seal. Specifically, the Court previously ordered that “any future filing that references the confidential[] agreement . . . shall be redacted.” *Doe v. Columbia*, ECF 36 at 7.

Accordingly, pursuant to Rule 6(d)(iii) of Your Honor’s Individual Rules and Practices in Civil Cases, with this letter-motion, Columbia submits (i) a version of Plaintiff’s Reply redacting, in a manner consistent with prior redactions in these cases, information concerning the parties’ confidential settlement agreement, and (ii) an unredacted copy highlighting the proposed redactions.

Respectfully submitted,



Gabrielle E. Tenzer

cc: Plaintiff John Doe (via mail & email)

---

<sup>1</sup> Plaintiff’s Reply was filed at ECF 66 in *Doe v. Columbia*, ECF 34 in *Doe v. Hunter*, and ECF 51 in *Doe v. Kachalia*.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JOHN DOE,

*Plaintiff,*

v.

COLUMBIA UNIVERSITY, *et al.*,

*Defendants.*

23-cv-10393 (DEH)

JOHN DOE,

*Plaintiff,*

v.

MARCUS JEREMY HUNTER, *et al.*,

*Defendants.*

23-cv-10394 (DEH)

JOHN DOE,

*Plaintiff,*

v.

NEEL H. KACHALIA, *et al.*,

*Defendants.*

23-cv-10395 (DEH)


**CERTIFICATE OF SERVICE**

I, Gabrielle E. Tenzer, declare under penalty of perjury that on February 28, 2025, I caused to be served Columbia's February 28, 2025 Letter-Motion to Seal, along with a redacted copy of Plaintiff's Reply Memorandum in Further Support of Motion to Alter or Amend the Judgment

Pursuant to Rule 59(e) ("Plaintiff's Reply") and copy of Plaintiff's Reply with proposed redactions highlighted, via electronic and physical mail to following address:

John Doe  
P.O. Box 209  
Buffalo, NY 14215  
jddoe591@gmail.com

Dated: February 28, 2025  
New York, New York

By:   
\_\_\_\_\_  
Gabrielle E. Tenzer  
HECKER FINK LLP  
350 Fifth Avenue, 63rd Floor  
New York, New York 10118  
Telephone: (212) 763-0883  
gtenzer@heckerfink.com


*Counsel for Defendant Trustees  
of Columbia University in the  
City of New York*

For the reasons discussed in the Court's August 1, 2024 Order, Defendant's motion to seal is **GRANTED**. See Case No. 23 Civ. 10393, ECF No. 36 at 7 ("In any future filing that references the confidentiality agreement and/or non-parties, the document shall be redacted. An unredacted version of such papers shall simultaneously be filed under seal.").

Plaintiff's reply memorandum, filed at ECF No. 66 in 23 Civ. 10393, ECF No. 34 in 23 Civ. 10394, and ECF No. 51 in 23 Civ. 10395, shall be placed under seal.

If Plaintiff believes that Defendants' redactions are overbroad, Plaintiff may file a letter motion identifying which portions of those filings Plaintiff believes should be unsealed, by March 24, 2025. Plaintiff may file any such letter brief under seal by emailing chambers at HoNYSDChambers@nysd.uscourts.gov. If any such letter motion is filed, Defendants may file an opposition under seal via the same procedure, by March 31, 2025.

The Clerk of Court is respectfully requested to terminate ECF No. 68 in 23 Civ. 10393, ECF No. 36 in 23 Civ. 10394, and ECF No. 53 in 23 Civ. 10395, and to mail a copy of this Order to Plaintiff.

  
Dale E. Ho  
United States District Judge

Dated: March 3, 2025  
New York, New York